RICHARD SIMPSON JAMES A. KIDNEY GERALD W. HODGKINS GREGORY G. FARAGASSO DANETTE EDWARDS THOMAS SWIERS 100 F St., NE Washington, D.C. 20549-5949 (202) 551-4492 (Simpson) (202) 772-9282 (Fax) simpsonr@sec.gov Attorneys for the Securities and Exchange Commission SECURITIES AND EXCHANGE) COMMISSION, Case No.: 2-13-cv-1658 **JCM-CWH** Plaintiff, PLAINTIFF'S MOTION TO FILE v. FIRST AMENDED COMPLAINT EDWIN YOSHIHIRO FUJINAGA, et al., Defendants. and CSA SERVICE CENTER, LLC, THE FACTORING CO., JUNE FUJINAGA and THE YUNJI TRUST **Relief Defendants**

Plaintiff, the Securities and Exchange Commission ("SEC" or "the Commission") respectfully moves, pursuant to Rule 15(a)(2), F.R. Civ. P., to file a First Amended Complaint adding three entities – The Factoring Co., June Fujinaga and The Yunji Trust – as relief defendants. Defendants MRI International, Inc. and Edwin Y. Fujinaga, and relief defendant CSA Service Center, LLC, (do/do not) consent to the filing of the amended complaint.

A copy of the proposed amended complaint and a memorandum in support of this motion are filed herewith. This motion is timely filed under the scheduling order entered by the Court on January 7, 2014.

Date: March 7, 2014 Respectfully submitted,

/s/Richard Simpson

RICHARD SIMPSON JAMES A. KIDNEY DANETTE EDWARDS THOMAS SWIERS 100 F St., NE Washington, D.C. 20549-5949 (202) 551-4441 (Kidney) (202) 772-9282 (Fax) kidneyj@sec.gov

Attorneys for the Securities and Exchange Commission

CERTIFICATE OF SERVICE

The undersigned attorney for the plaintiff hereby certifies that a copy of this Motion to File a First Amended Complaint, the proposed complaint and a memorandum in support of the motion was served via email and the Court's ECF system on the following counsel for the defendants on this 27th day of January 2014.

Daniel L. Hitzke
Hitzke & Associates
100 Oceangate
Suite 1100
Long Beach, California 90802
562-437-2807
562-595-9983 (Fax)
Daniel.hitzke@hitzkelaw.com

Erick Ferran Hitzke & Associates 3753 Howard Hughes Parkway Suite 200 Las Vegas, Nevada 89169 702-784-7660 702-784-7649 (Fax) Erick.ferran@ahlaw.net

/s/James A. Kidney